

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
vs.) No. 4:21-CR-00563-MTS-NCC
)
TAJUAN WILSON,)
)
Defendant.)

MOTION FOR PRE-TRIAL DETENTION AND HEARING

Comes now the United States of America, by and through its attorneys, Sayler A. Fleming, United States Attorney for the Eastern District of Missouri, and Geoffrey S. Ogden, Assistant United States Attorney for said District, and moves the Court to order defendant detained pending trial, and further requests that a detention hearing be held three (3) days from the date of defendant's initial appearance before the United States Magistrate pursuant to Title 18, United States Code, Section 3141, et seq.

As and for its grounds, the Government states as follows:

1. Defendant is charged with:
 - (a) an offense for which a maximum term of imprisonment of ten years or more is prescribed in the Controlled Substances Act (Title 21, United States Code, Section 801, et seq.), specifically conspiracy to distribute and possess with the intent to distribute a controlled substance, in violation of Title 21, United States Code, Sections 846 and 841(a).
2. Accordingly, a rebuttable presumption arises pursuant to Title 18, United States

Code, Section 3142(e)(3) that there are no conditions or combination of conditions which will reasonably assure the appearance of the defendant as required, and the safety of any other person and the community.

3. In the event Defendant somehow provided some evidence to overcome this presumption of detention, the facts and circumstances of this investigation lead to the conclusion that Defendant's pre-trial release would create a substantial risk to the safety of the community, as well as a potential flight risk.

4. Defendant's charges stem from an ATF investigation that began in roughly November 2020, which concerned substantial drug trafficking activity and firearms-related violence taking place in the Castle Pointe neighborhood of St. Louis County, as well as surrounding areas. The investigative team identified the HUGHES Drug Trafficking Organization (DTO), which included numerous members of the HUGHES family, including but not limited to David HUGHES, Otis HUGHES, Curtis HUGHES, Howard HUGHES, co-Defendant Christile HUGHES-DILLON, and Defendant, Tajuan WILSON. The HUGHES DTO also included many non-member associates living and operating in the Castle Pointe Neighborhood and elsewhere, including the co-Defendant Lorenzo SMITH, constituting an insular community. This investigation included substantial physical surveillance, the use of pole cameras, the use of precision location information warrants, the use of GPS tracker warrants, and the use of confidential informants to conduct controlled purchases of narcotics from various member of the DTO. Moreover, the investigation lead to the use of judicially authorized wire and electronic monitoring (wiretaps).

5. The investigation has revealed a substantial drug trafficking operation, where the HUGHES DTO was distributing large quantities of "crack" cocaine base, as well as fentanyl,

throughout St. Louis County. Moreover, the investigation revealed that members of the DTO regularly carried, distributed, and sold firearms in furtherance of their drug trafficking enterprise. Finally, investigators became aware during the first period of wire interception that Tajuan WILSON was the primary supplier for the HUGHES DTO.

6. The danger Defendant represents to the community is apparent as a result of not only his criminal history (to include convictions and arrests), but as a result of his conduct as observed over the intercepted communications, as well as physical surveillance.

7. Wire communications from Defendant's cellular device were monitored, and he regularly communicated with individuals for the purpose of arranging drug sales and delivering narcotics to numerous members of the HUGHES DTO. Physical surveillance and pole camera footage would corroborate these calls, and would reveal WILSON travel to these individuals with a bag or other item for a short visit, only to return home. This happened consistently throughout the past 4-5 months of wire/electronic monitoring. Moreover, other members were intercepted discussing WILSON, including conversations where he was discussed as supplying "everyone." Defendant was heavily involved in this organization, and has no other means of legitimate income to speak of.

8. On October 14, 2021, law enforcement executed approximately 14 search warrants, including 10 search warrants on various residences and businesses utilized by the HUGHES DTO. Defendant's primary stash house that he operated and where he would spend significant amounts of time and received orders/requests for drug deliveries. Investigators seized, among other items, approximately 1 kilogram of crack cocaine base and 1 kilogram of cocaine from Tajuan WILSON's residence.

9. The danger Defendant represents to the community is apparent from the facts

revealed throughout this investigation, but is compounded when considering his criminal history. A review of one criminal history database revealed Defendant's criminal history includes 2002-2003 convictions for Conspiracy to Distribute Cocaine Base (felony), and Possession with Intent to Distribute Cocaine Base (felony). Tajuan WILSON was also arrested by the Federal Bureau of Investigation for Distribution of Cocaine and Heroin (felony), found guilty of Conspiracy to Distribute Narcotics (felony) on March 16, 2015, and sentenced to 64 months confinement with 4 years of supervised release.

10. The investigation has revealed that Defendant represents a danger to the community, and that drug trafficking is his livelihood. Moreover, his criminal history makes it likely that he will be a Career Offender, resulting in a substantially higher sentencing exposure. The totality of his lead role in the DTO, combined with these circumstances, make him an unsuitable candidate for supervision.

WHEREFORE, the Government requests this Court to order defendant detained prior to trial, and further to order a detention hearing three (3) days from the date of defendant's initial appearance.

Respectfully submitted,

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